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BEFORE THE  
FEDERAL COMMUNICATIONS COMMISSION  
WASHINGTON, D.C. 20554

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BIENNIAL REGULATORY REVIEW 2000

COMMENTS  
of the  
GENERAL SERVICES ADMINISTRATION

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**COMMENTS  
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The General Services Administration ("GSA") submits these Comments on behalf of the customer interests of all Federal Executive Agencies ("FEAs") in response to the Public Notice released September 19, 2000 ("Notice"). The Notice seeks comments and replies on a report summarizing a staff review of the Commission's rules.

**I. INTRODUCTION**

Pursuant to Section 201(a)(4) of the Federal Property and Administrative Services Act of 1949, as amended, 40 U.S.C. 481(a)(4), GSA is vested with the responsibility to represent the customer interests of the FEAs before Federal and state regulatory agencies. From their perspective as end users, the FEAs have consistently supported the Commission's efforts to bring the benefits of competitive markets to consumers of all telecommunications services.

Under the Communications Act of 1934, as amended, and the Telecommunications Act of 1996, the Commission is required to review biennially its regulations pertaining to telecommunications service providers and broadcast ownership, and to determine whether competition has made these regulations

obsolete or no longer in the public interest.<sup>1</sup> On September 18, 2000, the staff issued the "Biennial Regulatory Review 2000" ("Staff Report") to summarize its work. The Commission seeks comments on the analysis and recommendations in the Staff Report, which is organized by part of the rules. In addition, parties are encouraged to comment or recommend changes in rules that are not specifically identified in the report, and to offer suggestions regarding substantive or administrative changes that might enable the Commission to operate more effectively.

GSA has a vital stake in this matter because Federal agencies are consumers of telecommunications services and facilities provided by all carriers subject to the Commission's regulations. As consumers, the FEAs recognize the importance of a regulatory framework that is not unreasonably expensive to operate and administer, but sufficiently powerful to promote the orderly development of competition and ensure that incumbent carriers do not exploit their market power where competition has not yet developed. Therefore, GSA responds to this opportunity to provide comments on rules that may have an impact on the costs and availability of all telecommunications services to end users.

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<sup>1</sup> Notice, p. 1.

## II. PART 32 – UNIFORM SYSTEM OF ACCOUNTS

Part 32 of the Commission's rules implements the legislative mandate that the Commission prescribe a uniform system of accounts ("USOA") for telephone companies. The USOA is an historical financial accounting system displaying the results of operational and financial events in a manner that enables company management and policy-making agencies to assess the results.<sup>2</sup> Through standard accounting procedures, the USOA helps ensure that ratepayers of regulated services do not bear the costs and risks associated with the competitive operations of incumbent local exchange carriers ("LECs").<sup>3</sup> The USOA also provides the Commission, state regulators, ratepayers, consumer advocates, the financial community, and others with the financial performance results for large LECs that are ultimately reflected in their charges for telecommunications services.<sup>4</sup>

The Staff Report describes the Commission's two-phased approach to streamlining its Part 32 accounting rules as the industry becomes increasingly competitive.<sup>5</sup> The Staff Report notes that in the Phase I Order the Commission substantially reduced the level of accounting detail required in certain reports, eliminated pre-notification requirements, relaxed cost allocation manual audit requirements, and streamlined a number of the reporting requirements for the Automated Reporting Management Information System ("ARMIS").<sup>6</sup> The Staff Report

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<sup>2</sup> Staff Report, p. 70.

<sup>3</sup> *Id.*

<sup>4</sup> *Id.*

<sup>5</sup> Staff Report, p. 72.

<sup>6</sup> *Id.*, citing Comprehensive Review of the Accounting Requirements and ARMIS Reporting Requirements for Incumbent Local Exchange Carriers; Phase I, CC Docket No. 99-255, Report and Order, FCC 00-78, released March 8, 2000 ("Phase I Order").

also notes that Phase II started in December 1999, and included a series of public workshops commencing in April 2000. The staff recommends additional substantial reductions in accounting requirements, including "reducing the chart of accounts, modifying expense limits, eliminating outdated accounts, and exempting certain transactions from the affiliate transactions rules."<sup>7</sup>

GSA filed Comments in the Phase I proceeding on August 23, 1999, and Reply Comments on September 9, 1999. In those submissions, GSA supported many of the Commission's proposed accounting changes.<sup>8</sup> However, GSA recommended that the Commission maintain accounting requirements sufficiently strong to prevent incumbent carriers from exploiting their market power where competition has not developed.<sup>9</sup>

GSA participated in the Phase II public workshops, and expects to address in detail any Phase II USOA proposals released by the Commission for public comment. In the interim, GSA urges the Commission to balance the requirements for effective regulatory controls with the need for less burdensome regulation in evaluating the staff's specific proposals. In reaching this balance, it is important to bear in mind that the USOA remains the foundation for economic regulation by the states, as well as by the Commission.

The Commission's statutory responsibility with respect to the USOA is stated as follows:

The Commission shall, by rule, prescribe a uniform system of accounts for use by telephone companies. Such uniform system shall require that each common carrier shall maintain a system of accounting methods, procedures and techniques (including

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<sup>7</sup> *Id.*, pp. 72–73.

<sup>8</sup> Phase I, Comments of GSA, pp. 12–15.

<sup>9</sup> *Id.*, p. 2.

accounts and supporting records and memoranda) which shall ensure a proper allocation of all costs to and among telecommunications services, facilities, and products (and to and among classes of such services, facilities and products) which are developed, manufactured or offered by such common carrier.<sup>10</sup>

The Commission must not lose sight of this basic responsibility with respect to the USOA as it acts to eliminate regulations. Just and reasonable rates for interstate and intrastate services depend upon informed regulatory decisions, and these decisions in turn depend upon a solid USOA.

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<sup>10</sup> Communications Act of 1934 as amended by the Telecommunications Act of 1996, Section 220 (a)(2).

## II. PART 36 – JURISDICTIONAL SEPARATIONS PROCEDURES

Part 36 of the Commission's rules implements a dual system of regulation through procedures and standards for apportioning carriers' investments, expenses, taxes, and reserves between the interstate and intrastate jurisdictions. In addition, the Part 36 rules promote universal service by allowing carriers that serve high-cost areas to allocate additional costs of access facilities to the interstate jurisdiction, and to recover those costs through the Federal high-cost support mechanism.

The Commission is currently considering this part of the rules in conjunction with the Federal-State Joint Board on Jurisdictional Separations ("Joint Board"). On July 21, 2000, the Joint Board recommended that the Commission freeze most of the category relationships and allocation factors employed in the separations process until reforms can be implemented.<sup>11</sup>

The staff recommends continuation of the work to develop and implement separations reform.<sup>12</sup> The only additional recommendations on Part 36 are to eliminate several provisions that have been replaced by rules in Part 54, or were specifically designated to be applicable in time periods that have concluded.<sup>13</sup>

GSA concurs with the staff's recommendations to eliminate rules that have been superseded, or are now out-of-date by definition. Moreover, GSA concurs with the proposal for a freeze. In Comments submitted recently in CC Docket No. 80-286, GSA explained that this moratorium will provide stability for all carriers — and the end

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<sup>11</sup> *In the Matter of Jurisdictional Separations Reform and Referral to the Federal-State Joint Board*, CC Docket No. 80-286 ("Separations Proceeding"), Public Notice, August 15, 2000, p. 1.

<sup>12</sup> Staff Report, p. 75.

<sup>13</sup> *Id.*



users subject to their charges — while the Commission and Joint Board address comprehensive reform of the entire jurisdictional separations process.<sup>14</sup>

Comprehensive reform of the dual regulatory system is a complex task. In addition to significant shifts among types of investments, there are major changes in the scope and pattern of network usage resulting from the confluence of many factors, including the explosive growth of Internet usage, more wideband data transmission, and cost-driven revisions in carriers' interexchange rate structures. GSA urges the Commission to continue to credit the needs of end users for effective and efficient regulatory surveillance when developing the necessary reforms for jurisdictional separations in this dynamic environment.

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<sup>14</sup> *Separations Proceeding*, Comments of GSA, September 25, 2000, pp. 3–5.

#### **IV. PART 43 – REPORTS OF COMMUNICATIONS COMMON CARRIERS AND CERTAIN AFFILIATES**

Among other matters, Part 43 prescribes general requirements and filing procedures for the annual ARMIS reports provided by large incumbent LECs. These reports assist the Commission in monitoring the industry to ensure that the LECs comply with the Commission's rules, and also to assist in tracking market and other industry developments. Both monitoring and tracking improve the Commission's ability to identify developing regulatory issues and to analyze the effects of alternative policy choices.<sup>15</sup>

The Staff Report notes that the Commission adopted various ARMIS streamlining measures in the Phase I Order discussed above in connection with the proposed Part 32 changes.<sup>16</sup> The staff recommends continuation of the ongoing efforts in Phase II to further streamline ARMIS reporting requirements.<sup>17</sup>

As noted above, GSA filed Comments in the Phase I proceeding on August 23, 1999, and Reply Comments on September 9, 1999. GSA supported many of the Commission's proposed ARMIS changes.<sup>18</sup> GSA recommended, however, that the Commission maintain reporting requirements that are sufficiently strong to prevent incumbent LECs from exploiting their market power where competition has not developed.<sup>19</sup>

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<sup>15</sup> Staff Report, p. 78.

<sup>16</sup> *Id.*, p. 79.

<sup>17</sup> *Id.*, p. 80.

<sup>18</sup> Phase I, Comments of GSA, pp. 15–18.

<sup>19</sup> *Id.*, p. 2.

GSA participated in the Phase II workshops, and expects to comment in detail on any Phase II ARMIS proposals released by the Commission. In the interim, GSA urges the Commission to balance the requirements for effective regulatory controls with the need for less burdensome regulation in evaluating the staff's proposals. In seeking this balance, the Commission should bear in mind that ARMIS reports are helpful not only to the Commission, but also to state regulators, ratepayers, consumer advocates, and other parties.

GSA also urges the Commission to consider enhancing one aspect of ARMIS which has proven inadequate in the face of technological developments. The USOA cable accounts do not differentiate between metallic and fiber cables, although carriers are required to maintain subaccounts for these technologies. As a result, ARMIS reports do not show separately the additions, retirements and balances for metallic and fiber. This information has proven critical in evaluation of the effects of trends in the industry. GSA recommends, therefore, that the Commission require the incumbent LECs to report investment and depreciation data for cable accounts by their metallic and fiber subaccounts

## V. PART 51 – INTERCONNECTION

Part 51 of the Commission's rules specify the obligations on all local exchange carriers on matters related to interconnections. The rules address engineering requirements for interconnections, pricing of network elements, resale obligations and pricing, reciprocal compensation, and additional issues that are critical in fostering local exchange and local access competition.

The staff recommends continued monitoring of the development of competition.<sup>20</sup> The staff also recommends that the Commission re-evaluate the various mechanisms for inter-carrier compensation.<sup>21</sup> However, the report contains no specific recommendations for changes in the rules in Part 51.

GSA concurs with the recommendations for continued monitoring. Indeed, GSA submitted comments in CC Docket No. 99–301 urging the Commission to implement a comprehensive program for collecting data on the status of competition for local telephone and advanced telecommunications services.<sup>22</sup> From its perspective as an end user, GSA urged the Commission to adopt reporting requirements that are sufficient to ensure the orderly development of competition, but not so extensive that they impair the development of the competition that they are designed to measure.<sup>23</sup> Moreover, to shape the requirements for regulation and assess requirements to implement the pro-competitive tools at the Commission's disposal, it is important to

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<sup>20</sup> Staff Report, p. 82.

<sup>21</sup> *Id.*

<sup>22</sup> *In the Matter of Local Competition and Broadband Reporting*, CC Docket No. 99–301, Comments of GSA, December 3, 1999, pp. 3–6.

<sup>23</sup> *Id.*

have reliable and geographically targeted information on existing and projected levels of competition for all telecommunications services.

GSA also concurs with the recommendation that the Commission continue to re-evaluate mechanisms for inter-carrier compensation. In Comments submitted in CC Docket No. 96-98, GSA explained that the Commission's rules concerning compensation for traffic bound to Internet service providers ("ISPs") will determine the availability of services that permit government agencies, businesses, and individuals to communicate and obtain information through a worldwide network of interconnected computers.<sup>24</sup> Moreover, GSA explained that reciprocal compensation plans developed in proceedings before state regulatory agencies should not be used for Internet messages.<sup>25</sup> Thus, GSA strongly urged the Commission to retain authority over inter-carrier compensation plans to ensure that the plans reflect the unique characteristics of Internet traffic, help foster development of the Internet, and protect the interests of end users.<sup>26</sup>

Finally, GSA believes there are a number of steps that the Commission should take to facilitate collocation of equipment owned by competitive LECs at incumbent carriers' facilities. GSA is planning to submit Comments in CC Docket Nos. 98-147 and 96-98 on October 12, 2000. In those Comments, GSA will recommend that the Commission adopt collocation space reservation policies and time limits for incumbent LECs to meet collocation requests that depend on the type of facility and significant work-sharing by the competitive LEC to prepare the collocation site. Also, GSA will recommend that the Commission allow competitive carriers to implement direct links

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<sup>24</sup> In the Matter of Implementation of Local Competition Provisions of the Telecommunications Act of 1996, CC Docket No. 96-98, Comments of GSA, p. 3.

<sup>25</sup> *Id.*, pp. 5-10.

<sup>26</sup> *Id.*

with each other within incumbent LECs' central offices. Moreover, GSA will recommend that the Commission take several steps that open additional opportunities for interconnection, including additions to the rules so that competitive LECs have more options to use copper loop plant that incumbent carriers propose to retire.

## **VI. PART 54 – UNIVERSAL SERVICE**

Part 54 of the Commission's rules implements the legislative directive that the Commission establish specific, predictable and sufficient mechanisms to preserve and advance universal service. The Part 54 rules govern the operation of the four universal service initiatives: (1) the high-cost support program, which provides aid to help maintain affordable rates in areas that are more costly to serve; (2) the low-income support mechanism, which provides support to help keep rates affordable for lower income users; (3) the schools and libraries program, which subsidizes Internet access and other services for eligible schools and libraries; and (4) the rural health care support program, which provides support for telecommunication services to qualifying providers of health care services.

The Staff Report does not recommend any major new initiatives concerning the universal service rules.<sup>27</sup> However, the staff recommends modifying Part 54 to streamline the process for appeals of funding decisions by the Universal Service Administrative Company and minor revisions to remove transitional provisions that are no longer applicable.<sup>28</sup>

The Staff Report notes that many of the Part 54 rules have been updated many times.<sup>29</sup> In fact, the most recent proceeding to address these rules, not mentioned in the Staff Report, was initiated by a recent Public Notice in CC Docket No. 96–45.<sup>30</sup>

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<sup>27</sup> Staff Report, p. 88.

<sup>28</sup> *Id.*

<sup>29</sup> *Id.*

<sup>30</sup> *In the Matter of Federal–State Joint Board on Universal Service*, CC Docket No. 96–45, Public Notice, July 11, 2000, pp. 1–2.

That notice requested comments on issues concerning the high-cost support mechanism for non-rural carriers.

The FEAs have a vital interest in universal service initiatives because the ability to communicate with all members of the public is necessary for civilian and military agencies to perform their activities. GSA recently addressed this matter in Comments and Reply Comments in response to the aforementioned Public Notice.<sup>31</sup> In those submissions, GSA urged continuation of the hold harmless provision for long-term support in order to protect consumers and carriers in high-cost areas until the Commission develops a new universal service plan for rural carriers and access charge reform for rate-of-return carriers.<sup>32</sup>

In supporting the hold harmless rules as an interim measure, GSA explained that this procedure entails substantial implicit subsidies that are antithetical to open competition.<sup>33</sup> Therefore, GSA urged the Commission to proceed under an accelerated schedule to eliminate the conditions that require continuation of the procedure.<sup>34</sup> With respect to Part 54 of the rules, GSA recommends that the Commission proceed expeditiously in a notice and comment proceeding to reform support programs for rural carriers. Also, GSA recommends that the Commission proceed quickly to address the access charges for rate-of-return carriers when making changes concerning Parts 64 and 69 of the Commission's rules.

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31 *Id.*, Comments of GSA, August 14, 2000; and Reply Comments of GSA, August 28, 2000.

32 *Id.*, Comments of GSA, pp. 3-6.

33 *Id.*, p. 5.

34 *Id.*



## VII. PART 61 – TARIFFS

Part 61 of the Commission's rules establish the requirements concerning filing, form, content, notice periods, and accompanying support for tariffs governing interstate services. Also, Part 61 sets forth the pricing rules and related requirements that apply to incumbent LECs that are subject to price cap regulation.

The staff recommends retaining the existing Part 61 requirements, with continued monitoring of developments to permit changes as warranted by increased competition.<sup>35</sup> However, the staff recommends that the Commission extend mandatory detariffing to the international services of non-dominant interexchange carriers, including Commercial Mobile Radio Service ("CMRS") providers and U.S. carriers classified as dominant solely because of their affiliation with overseas carriers.<sup>36</sup>

GSA concurs with the staff's recommendations. With the exception of the tariffing requirements for international services, the existing rules benefit the public by providing information on the rates, terms and conditions for telecommunications services. Moreover, the price cap rules protect consumers by capping the rates charged by LECs and limiting the potential for these firms to exercise market power in an anticompetitive manner.

GSA also concurs with the recommendation to detariff international services. Indeed, GSA submitted Comments and Reply Comments on CC Docket No. 96-61 with the same recommendation.<sup>37</sup> Moreover, GSA recommended that the

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<sup>35</sup> Staff Report, p. 92.

<sup>36</sup> *Id.*, pp. 92-93.

<sup>37</sup> *In the Matter of Policy and Rules Concerning the Interstate, Interchange Marketplace*, CC Docket No. 96-61, Comments of GSA, May 31, 2000; and Reply Comments of GSA, June 9, 2000.

Commission employ a very short (or no) transition period for detariffing of long-term service agreements to be effective.<sup>38</sup>

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<sup>38</sup> *Id.*, Comments of GSA, pp. 6–8.

## **VIII. PART 64 – MISCELLANEOUS RULES RELATING TO COMMON CARRIERS**

Subpart I of Part 64 of the rules implements the legislative mandate that the Commission prescribe procedures for the allocation of carriers' costs between regulated and non-regulated services. This subpart also requires large incumbent LECs to file cost allocation manuals ("CAMs") and engage independent auditors to verify their compliance with the Commission's cost allocation requirements. Subpart I rules are intended to foster competition and protect consumers by preventing cross-subsidization between regulated and non-regulated services provided by large incumbent LECs.<sup>39</sup>

The Staff Report notes that the Commission adopted various cost allocation streamlining measures in the Phase I order discussed above in connection with Part 32 changes.<sup>40</sup> The staff recommends that the Commission consider additional changes to CAM requirements in Phase II of its accounting review.<sup>41</sup>

As noted above, GSA filed Comments in the Phase I proceeding on August 23, 1999, and Reply Comments on September 9, 1999. GSA recommended that the Commission maintain cost allocation requirements sufficiently strong to prevent incumbent carriers from exploiting their market power where competition has not developed.<sup>42</sup>

GSA participated in the Phase II workshops, and expects to comment in detail on any Phase II cost allocation proposals released for public comment. In the interim,

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<sup>39</sup> Staff Report, p. 110.

<sup>40</sup> *Id.*, p. 111.

<sup>41</sup> *Id.*

<sup>42</sup> Phase I, Comments of GSA, p. 2.

GSA urges the Commission to balance the requirements for effective regulatory controls with the need for less burdensome regulation when evaluating the staff's specific proposals. In seeking this balance, the Commission should bear in mind that its cost allocation rules are crucial to the prevention of cross-subsidization of competitive ventures by regulated services.

## **IX. PART 65 – INTERSTATE RATE OF RETURN PRESCRIPTION PROCEDURES AND METHODOLOGIES**

Part 65 of the rules sets forth procedures and methodologies used by the Commission to prescribe an authorized interstate rate-of-return for the exchange access services provided by incumbent LECs subject to rate-of-return regulation. The authorized rate-of-return is also used for additional regulatory purposes, such as universal service and low-end adjustment calculations.

The Staff Report notes that the Commission substantially reformed its Part 65 rules in 1995.<sup>43</sup> The Staff Report also notes that the Common Carrier Bureau initiated a proceeding in October 1998 to represcribe the interstate rate-of-return.<sup>44</sup> That proceeding has not been completed. The staff recommends no further changes to Part 65 at this time.<sup>45</sup>

GSA filed a Direct Case in the rate-of-return proceeding on January 19, 1999, and a Reply to Direct Cases on March 16, 1999. In those submissions, GSA recommended that the Commission reduce the authorized rate-of-return from 11.25 percent to 9.5 percent.<sup>46</sup> In GSA's view, the failure of the Commission to prescribe a lower rate-of-return on a timely basis continues to have a harmful impact on interstate ratepayers. The direct and indirect effects of an out-of-date rate-of-return prescription are serious, and demand Commission action. GSA urges the

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<sup>43</sup> Staff Report, p. 139.

<sup>44</sup> *Id.*, citing Prescribing the Authorized Unitary Rate of Return for Interstate Services of Local Exchange Carriers, CC Docket No. 98-166, Notice Initiating a Prescription Proceeding and Notice of Proposed Rulemaking, FCC 98-222, released October 5, 1998 ("Rate-of-Return Proceeding").

<sup>45</sup> Staff Report, p.139

<sup>46</sup> Rate-of-Return Proceeding, Direct Case of GSA, p. 23.

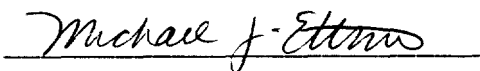
Commission to bring its rate-of-return represcription proceeding to a just conclusion on an expedited basis.

## **X. CONCLUSION**

As a major user of telecommunications services, GSA urges the Commission to implement the recommendations set forth in these Comments.

Respectfully submitted,

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October 10, 2000

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I, MICHAEL J. ETTNER, do hereby certify that copies of the foregoing "Comments of the General Services Administration" were served this 10th day of October, 2000, by hand delivery or postage paid to the following parties.

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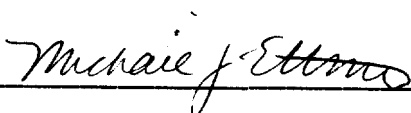
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